

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

WSOU INVESTMENTS, LLC, d/b/a  
BRAZOS LICENSING AND DEVELOPMENT,

Plaintiff,

v.

HEWLETT PACKARD ENTERPRISE  
COMPANY,

Defendant.

Civil Action No. 6:20-cv-00730-ADA

**DECLARATION OF MICHAEL R. FRANZINGER IN SUPPORT OF  
HEWLETT PACKARD ENTERPRISE COMPANY'S REPLY BRIEF TO ITS MOTION  
TO DISMISS FOR LACK OF SUBJECT MATTER JURISDICTION PURSUANT TO  
FEDERAL RULE OF CIVIL PROCEDURE 12(B)(1)**

I, Michael R. Franzinger, hereby declare, affirm and state as follows:

1. I am an attorney with Sidley Austin LLP, counsel to Defendant Hewlett Packard Enterprise Company. I am a member of the bar of this Court. I have personal knowledge of the matters stated in this Declaration and would testify truthfully to them if called upon to do so.
2. Attached hereto as Exhibit 18 is a true and correct copy of WSOU's Responses and Objections to HPE's First Sets of Requests for Production, as served in this litigation.
3. Attached hereto as Exhibit 19 is a true and correct copy of an email from T. Rousseau to M. Hatcher, dated September 24, 2021, as served in this litigation.
4. Attached hereto as Exhibit 20 is a true and correct copy of the Second Amended and Restated Operating Agreement of WSOU Investments, LLC produced by WSOU bearing Bates Nos. WSOU-HPE-00020164–20237, as served in this litigation.

5. Attached hereto as Exhibit 21 is a true and correct copy of the Patent Security Agreement produced by WSOU bearing Bates Nos. WSOU-HPE-00009622–00009626, as served in this litigation.

6. Attached hereto as Exhibit 22 is a true and correct copy of WSOU’s production email, dated October 14, 2021, as served in this litigation.

7. Attached hereto as Exhibit 23 is a true and correct copy of the Amended Schedule B2: Assignment of Patent Rights by Nokia Solutions and Networks BV produced by WSOU bearing Bates Nos. WSOU-HPE-00008889–00008896, as served in this litigation.

8. Attached hereto as Exhibit 24 is a true and correct copy of the Amended Schedule B3: Assignment of Patent Rights by Nokia Technologies Oy produced by WSOU bearing Bates Nos. WSOU-HPE-00008897–00008958, as served in this litigation.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ Michael R. Franzinger  
Michael R. Franzinger